

CENTRAL STEEL DRUM COMPANY

EMPTY DRUM CERTIFICATION

I hereby certify that these drums are "empty" as that term is defined in the national Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Date: _____

*With regard to most regulated residues, EPA's 40 CFR 261.7 says: "A container . . . is empty if:

(i) All wastes have been removed that can be removed using the practices of community employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating, and

(ii) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container"

EPA has explained this rule, saying that "one inch of waste material is an overriding constraint and may remain in an empty container only if it cannot be removed by normal means. The rationale for this provision is that there are certain tars and other extremely viscous materials that will remain in the container even after the container is emptied by normal means."

For residues of products specifically listed by name in 40 CFR 261.33(e), EPA says the container is empty only "if the container . . . has been triple-rinsed using a solvent capable of removing" the product, or has been cleaned by another method shown to achieve equivalent removal.

**DOT's 49 CFR 173.29 says that all openings on the empty container must be closed, and that all markings and labels must be in place as if the drum were full of its original contents. A DOT shipping paper is not required for transportation of a drum for reconditioning via contract or private motor carrier. DOT placarding is not required for vehicles carrying empty containers.

704 DOREMUS AVENUE
NEWARK, NEW JERSEY 07105


 28 S. Hanover Street
 Pottstown, PA 19464
 215/327-0880


October 1, 1991

To: CITY DISPOSAL
 1715 SUMMIT AVENUE
 UNION CITY NJ 07087
 ATTN: JOE SIMEONE
 1-201-330-0544

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

Sample I.D. AA14123
 Client's Code: CITYDISP
 Client's Description: CENTRAL STEEL DRUM CO.
 Sample collector: CUSTOMER Sample collection date: 09/06/91
 Laboratory submittal date: 09/17/91 Time: 11:40

Parameter	Result
TCLP Extraction - Conventional	see appended report
TCLP Metals	see appended report
TCLP Mercury	less than 0.005 mg/L
TCLP Copper	1.35 mg/L
TCLP Zinc	24.50 mg/L
TCLP Extraction by ZHE	see appended report
TCLP Volatiles	see appended report
pH-Corrosivity	12.3 pH Units
Cyanide, Total	less than 0.6 mg/Kg
Cyanide, Amenable	less than 0.6 mg/kg
Sulfide, Reactive	less than 50.0 mg/Kg
Flash Point Ignitability	greater than 140 degrees F
PCBs	see appended report

Data for PCBs mg/KG:

Component Name	Concentration	Component MDL
Aroclor 1016	<0.5	0.5
Aroclor 1221	<0.5	0.5
Aroclor 1232	<0.5	0.5
Aroclor 1242	<0.5	0.5
Aroclor 1248	<0.5	0.5
Aroclor 1254	<0.5	0.5



WASTEX
INDUSTRIES, INC.

28 S. Hanover Street
Pottstown, PA 19464
215/327-0880



CITY DISPOSAL
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October 1, 1991

Sample I.D. AA14123 (continued)

Data for PCBs (continued):

Component Name	Concentration	Component MDL
Aroclor 1260	<0.5	0.5

Data for TCLP Metals mg/L:

Component Name	Concentration	Component MDL
Arsenic	<0.10	0.10
Barium	7.46	0.50
Cadmium	0.222	0.005
Chromium	0.05	0.05
Lead	0.29	0.05
Selenium	<0.05	0.05
Silver	<0.05	0.05

Data for TCLP Extraction - Conventional:

TCLP COMPLETED.

Data for TCLP Extraction by ZHE:

SEE ATTACHED

Data for TCLP Volatiles:

SEE ATTACHED

Comments:
CENTRAL STEEL DRUM CO. BLASTER DUST

If there are any questions regarding this data, please call.

1A
VOLATILE ORGANICS ANALYSIS DATA SHEET

Lab Name: WASTEX INDUSTRIES, NJDEP Cert.# 77371

Project Name: CENTRAL STEEL DRUM CO.

Lab Sample No. : AA14123

Sample Ident: BLASTER DUST

Lab File ID : >C1678
: >C1685

Sample Matrix: ZERO HEADSPACE EXTRACT

Date Analyzed : 09/25/91
: 09/26/91

Dilution Factor: 1.00
: 10.00

CAS No.	COMPOUND	CONCENTRATION UNITS: UG/L	Q
75-01-4	-----Vinyl Chloride		5
75-35-4	-----1,1-Dichloroethene		5
67-66-3	-----Chloroform		10
107-06-2	-----1,2-Dichloroethane		5
78-93-3	-----2-Butanone		1240
56-23-5	-----Carbon Tetrachloride		5
79-01-6	-----Trichloroethene		5
71-43-2	-----Benzene		5
127-18-4	-----Tetrachloroethene		6.5
108-90-7	-----Chlorobenzene		5
106-46-7	-----1,4-Dichlorobenzene		5

- Q - Data reporting qualifiers:
 U - Indicates the compound was analyzed for but not detected.
 J - Indicates an estimated value used when a compound is detected at less than the specified detection limit.
 B - Indicates the analyte was found in the blank as well as in the sample.
 E - Indicates the analyte concentration exceeds the calibration range of the GC/MS instrument for that specific analyte.



December 3, 1992

To: CITY DISPOSAL
1715 SUMMIT AVENUE
UNION CITY NJ 07087
ATTN: JOE SIMEONE
1-201-330-0544 FAX 201 330-0391

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory:

Sample I.D. AB03007 Purchase order number: CENTRAL
Client's Code: CITYDISP
Client's Description: CENTRAL STEEL DRUM CO.
Sample collector: CUSTOMER
Sample collection date: 11/15/92 Time: 10:00
Laboratory submittal date: 11/18/92 Time: 14:15

Parameter	Result
TCLP Extraction - Conventional	see appended report
TCLP Volatiles	see appended report
TCLP Semivolatiles	see appended report
TCLP Extraction by ZHE	see appended report
TCLP Metals	see appended report
TCLP Mercury	less than 0.010 mg/l
TCLP Pesticides and Herbicides	see appended report
TCLP Copper	0.54 mg/l
TCLP Zinc	1.11 mg/l
pH-Corrosivity	10.8 pH Units
Cyanide, Total	less than 0.6 mg/kg
Cyanide, Amenable	less than 0.6 mg/kg
Sulfide, Reactive	less than 50.0 mg/kg
Flash Point Ignitability	greater than 140 degrees F
PCBs	see appended report

Data for PCBs mg/kg:

Component Name	Concentration	Component MDL
Aroclor 1016	< 0.5	0.5
Aroclor 1221	< 0.5	0.5
Aroclor 1232	< 0.5	0.5



CITY DISPOSAL

Sample I.D. AB03007 (continued)

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December 3, 1992

Data for PCBs (continued):

Component Name	Concentration	Component MDL
Aroclor 1242	< 0.5	0.5
Aroclor 1248	< 0.5	0.5
Aroclor 1254	< 0.5	0.5
Aroclor 1260	< 0.5	0.5

Data for TCLP Pesticides and Herbicides mg/l:

Component Name	Concentration	Component MDL
Endrin	< 0.002	0.002
Lindane	< 0.002	0.002
Methoxychlor	< 0.10	0.10
Toxaphene	< 0.005	0.005
Chlordane	< 0.002	0.002
Heptachlor	< 0.002	0.002
Heptachlor Epoxide	< 0.002	0.002
2,4-D	< 0.10	0.10
2,4,5-TP (Silvex)	< 0.01	0.01

Data for TCLP Metals mg/l:

Component Name	Concentration	Component MDL
Arsenic	0.13	0.10
Barium	1.50	0.50
Cadmium	0.04	0.005
Chromium	2.41	0.05
Lead	0.21	0.05
Selenium	0.31	0.05
Silver	< 0.05	0.05

Data for TCLP Extraction - Conventional:

TCLP WAS SET UP ON 11/19/92. IT WAS FILTERED ON 11/20/92. LJB

Data for TCLP Volatiles:

SEE ATTACHED



28 S. Hanover Street
Pottstown, PA 19464
215/327-0880



CITY DISPOSAL

Sample I.D. AB03007 (continued)

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December 3, 1992

Data for TCLP Semivolatiles:

SEE ATTACHED

Data for TCLP Extraction by ZHE:

SEE ATTACHED

Comments:

CENTRAL STEEL DRUM CO. #1 GRAB WASTE PILE SOIL

If there are any questions regarding this data, please call.

A handwritten signature in cursive script, reading 'Tim Heats', written over a horizontal line.

Released By

1A
VOLATILE ORGANICS ANALYSIS DATA SHEET

Lab Name: WASTEX INDUSTRIES, NJDEP Cert.# 77371

Project Name: CENTRAL STEEL DRUM

Lab Sample No. :AB03007

Sample Ident: WASTE PILE SOIL

Lab File ID : >C7623

Sample Matrix: ZERO HEADSPACE EXTRACT

Date Analyzed : 12/01/92

Dilution Factor: 1.00

		CONCENTRATION UNITS: UG/L		Q
CAS No.	COMPOUND			
75-01-4	-----Vinyl Chloride	---	5	U
75-35-4	-----1,1-Dichloroethene	---	5	U
67-66-3	-----Chloroform	---	10	U
107-06-2	-----1,2-Dichloroethane	---	5	U
78-93-3	-----2-Butanone	---	78.9	U
56-23-5	-----Carbon Tetrachloride	---	5	U
79-01-6	-----Trichloroethene	---	5	U
71-43-2	-----Benzene	---	17.1	U
127-18-4	-----Tetrachloroethene	---	8.3	U
108-90-7	-----Chlorobenzene	---	5	U
106-46-7	-----1,4-Dichlorobenzene	---	5	U

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 U - Indicates the compound was analyzed for but not detected.
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 B - Indicates the analyte was found in the blank as well as in the sample.
 E - Indicates the analyte concentration exceeds the calibration range of the GC/MS instrument for that specific analyte.

1B
SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

PAGE 1 of 1

Lab Name: WASTEX INDUSTRIES, NJDEP Cert.# 77371

Project Name: CENTRAL STEEL DRUM Lab Sample No. :AB03007

Sample Ident: WASTE PILE SOIL Lab File ID : >D0535

Sample Matrix: TCLP EXTRACT Date Analyzed : 11/30/92

Dilution Factor: 5.00

CAS No.	COMPOUND	CONCENTRATION UNITS: UG/L		Q
110-86-1	-----Pyridine	25	U	
95-48-7	-----2-Methylphenol	25	U	
108-39-4	-----3-Methylphenol	25	U	
106-44-5	-----4-Methylphenol	25	U	
106-46-7	-----1,4-Dichlorobenzene	25	U	
67-72-1	-----Hexachloroethane	25	U	
98-95-3	-----Nitrobenzene	25	U	
87-68-3	-----Hexachlorobutadiene	25	U	
88-06-2	-----2,4,6-Trichlorophenol	25	U	
95-95-4	-----2,4,5-Trichlorophenol	25	U	
121-14-2	-----2,4-Dinitrotoluene	25	U	
118-74-1	-----Hexachlorobenzene	25	U	
87-86-5	-----Pentachlorophenol	125	U	

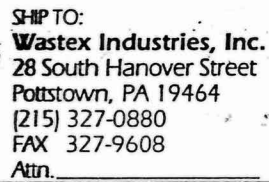
Q - Data reporting qualifiers:

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B - Indicates the analyte was found in the blank as well as in the sample.

E - Indicates the analyte concentration exceeds the calibration range of the GC/MS instrument for that specific analyte.



TOTAL ANALYTICAL SERVICES FOR A SAFE ENVIRONMENT

REPORT TO: _____ Page _____ of _____
Client Name CITY DISPOSAL, INC.
Address 1715 Summit Ave.
UNION CITY NJ 07087
Phone 201-350-0741 FAX 201-350-0741
Attn. MANAGER

WASTEX INDUSTRIES, INC.

CHAIN OF CUSTODY RECORD

[illegible]

Client Retains Pink Copy Only